

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA,

- v. -

THOMAS SCOTT,
a/k/a "Tommy Guns,"

Defendant.

- - - - -X

COUNT ONE

The United States Attorney charges:

1. From at least in or about January 2008, up to and including in or about August 2009, in the Southern District of New York and elsewhere, THOMAS SCOTT, a/k/a "Tommy Guns," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that THOMAS SCOTT, a/k/a "Tommy Guns," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance in violation of 21 U.S.C. § 841(a)(1).

3. The controlled substance involved in the offense was one kilogram and more of mixtures and substances containing a

SUPERSEDING
INFORMATION

²
S~~1~~ 12 Cr. 871 (CM)

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: DEC 11 2013

detectable amount of heroin, in violation of 21 U.S.C.

§ 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO

The United States Attorney further charges:

4. From at least in or about February 2012, up to and including on or about October 22, 2012, in the Southern District of New York and elsewhere, THOMAS SCOTT, a/k/a "Tommy Guns," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

5. It was a part and an object of the conspiracy that THOMAS SCOTT, a/k/a "Tommy Guns," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance in violation of 21 U.S.C. § 841(a)(1).

6. The controlled substance involved in the offense was one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT THREE

The United States Attorney further charges:

7. From at least in or about January 2008, up to and including at least in or about October 2012, in the Southern District of New York and elsewhere, THOMAS SCOTT, a/k/a "Tommy Guns," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 1957(a).

8. It was a part and an object of the conspiracy that THOMAS SCOTT, a/k/a "Tommy Guns," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, willfully and knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, narcotics trafficking, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified

unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

(Title 18, United States Code, Section 1956(h).)

Forfeiture Allegation

9. As a result of committing the controlled substance offenses charged in Counts One and Two of this Information, THOMAS SCOTT, a/k/a "Tommy Guns," the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of said offenses and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses charged in Counts One and Two of the Information.

10. As a result of committing the offense of conspiracy to launder money, as alleged in Count Three of this Information, THOMAS SCOTT, a/k/a "Tommy Guns," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1)(A), all property, real and personal, involved in the offense and all property traceable to such property.

Substitute Asset Provision

11. If any of the above-described forfeitable property, as a result of any act or omission of THOMAS SCOTT, a/k/a "Tommy Guns," the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of SCOTT up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)



PREET BHARARA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

THOMAS SCOTT,
a/k/a "Tommy Guns,"

Defendant.

**SUPERSEDING
INFORMATION**

S1 12 Cr. 871 (CM)

(21 U.S.C. § 846; 18 U.S.C. § 1956(h).)

PREET BHARARA
United States Attorney.
